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From: David Webb [mailto:dwebb@dishmail.net]

Sent: Monday, November 22, 2010 7:53 AM

To: Groundwater Elevation Support

Cc: Staton, Kelly

Subject: Casgem guidelines

Greetings:

Regarding the proposed CASGEM guidelines, I believe that additional material needs to be considered and provided focused on the utility, advisability and precautions associated with the use of domestic wells for monitoring purposes.

Areas with numerous identified GW basins and limited funding can be expected to need to utilize such wells if any monitoring is to occur in the absence of irrigation wells which are often not present (or not available) in many of those basins, and dedicated monitoring wells which are not feasible from a cost standpoint.

Issues that immediately come to mind relate to potential health issues associated with possible cross contamination or perceived cross contamination between wells.

1.Many irrigation wells with turbine pumps have an oil layer floating on their surface from system leaks and over-oiling.Many homeowners would likely not wish to have such unknown oils and oil additives potentially transferred to their domestic supply, even in the small quantities found on sounder tapes.

2.In the past, some submersible well pumps were oil-filled with oil containing PCBs.Some were discovered when they failed and serious decontamination issues resulted.Others undoubtedly were never discovered, and may have left PCB-laden oil behind, oil that would then contaminate any measurement equipment, the person taking those measurements, the equipment used, and other wells subsequently visited.

3. Nuisance factors:The insertion and threading down of even wire tapes can disturb rust build-up on casing surfaces, resulting in rusty water and rust particles being drawn up in the domestic pump.Since many samplers may be unaware of this risk, they may fail to properly apprise potential domestic well owners of that consequence when requesting use of their wells for monitoring purpose, resulting in future program difficulties.There may be other potential consequences that I am unaware of that an experienced well monitoring person would be that should be relayed to the pool of future monitors.

Thank you.

David Webb